

EXHIBIT A

From: petersjoan <petersjoan@bellsouth.net>
To: Andrew Brettler <abrettler@berkbrettler.com>; Carlos Garcia Perez <cgarciaperez@smgqlaw.com>; Gustavo D. Lage <glage@smgqlaw.com>; Jake Camara <jcamara@berkbrettler.com>; Patricia M. Patino <ppatino@bilzin.com>; Joel Sichel <jsichel@berkbrettler.com>
Sent: Thursday, November 20, 2025 at 11:26:50 AM EST
Subject: November 19 Meet and Confer

Counsel:

During our November 19th meet and confer we discussed issues with Defendant's document production and Plaintiff's potential motion to compel. You agreed to review the stated deficiencies and provide additional responsive documents on November 24th or no later than November 26th. We will review the additional documents and determine if there is still need for the Court's intervention. We also confirmed your availability for a hearing on the matter on Magistrate Torres' discovery calendar on either December 11 or 18.

We also agreed to the mediation date of December 22nd with Helen Preddy, the mediator proposed by defendant.

We discussed issues regarding defendant's subpoena to depose non-party witness Lauren Hayden. Plaintiff will be representing Ms. Hayden for the purposes of her deposition and will accept service of process on her behalf. We agreed to provide Ms Hayden's available dates to be deposed and the county of her residence. Accordingly, Ms. Hayden resides in [REDACTED] and is available to be deposed, based on her work schedule, on the morning of either December 6 or 13.

Finally, Mr. Brettler advised that Defendant will move forward with service of a subpoena duces tecum on non-party witness [REDACTED].

Regards,
Joan